

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

Petition for Declaratory Ruling that)	
The Telecommunications Rate Applies)	
To Cable System Pole Attachments Used)	WC Docket No. 09-154
To Provide Interconnected Voice over)	
Internet Protocol Service)	

COMMENTS OF AT&T, INC.

AT&T Inc., on behalf of itself and its affiliates (AT&T) respectfully submits these comments in response to the Petition for Declaratory Ruling (Petition) submitted by American Electric Power Service Corporation, Duke Energy Corporation, Southern Company Services, Inc., and Xcel Energy Services Inc. (the “ELCOs”), which asks the Commission to declare that the telecommunications rate for pole attachments used for traditional telephone service should apply to cable system pole attachments used to provide interconnected voice over internet protocol (VoIP) service.¹

I. DISCUSSION

A. While AT&T Generally Agrees with the ELCOs’ Goal of Attachment Rate Parity, the ELCOs’ Petition Offers Only a Piecemeal Solution

The crux of the ELCOs’ position is that rates cable VoIP providers pay to attach VoIP-enabling facilities to poles, ducts and conduits should be increased from rates derived from Section 224 (d)’s² cable rate formula (the “Cable Rate”) to the levels that CLECs pay (the

¹ *Pleading Cycle Established for Comments on Petition for Declaratory Ruling of American Electric Power Service Corporation et al., Regarding the Rate for Cable System Pole Attachments Used to Provide Voice over Internet Protocol Service*, WC Docket No. 09-154 (rel. Aug. 25, 2009) (*Public Notice*).

² 47 U.S.C. § 224 (d). For general discussion of pole attachment rate formulas, see *Implementation of Section 224 of the Act; Amendment of the Commission’s Rules and Policies Governing Pole Attachments*, WC Docket No. 07-245, Notice of Proposed Rulemaking 22 FCC Rcd 20,195 at 20,196-201 (2007) (*2007 Pole Attachment NPRM*).

“Telecom Rate”) to attach facilities for their competing voice telecommunications services.³ In support of that position, the ELCOs cite concerns about competitive parity in the provision of telephone service, the need to eliminate the cable companies’ inherent market advantage due to the lower rates they pay for these inputs and the need to facilitate broadband penetration by eliminating such rate disparities.⁴ They contend that the Commission can and should address these issues now, and need not wait until it classifies VoIP for regulatory purposes (an issue presently pending before the Commission).⁵ They further argue that a prompt resolution would eliminate confusion and disputes between cable companies and pole owners over rates, bring competitive balance to the market for these “functionally equivalent services,” and end subsidies being paid by electric ratepayers as a consequence of the rate disparity in the existing system.⁶

AT&T agrees that resolution of the pole attachment issues identified in the Petition is important, particularly since the demand for VoIP service is growing and the already prevalent disputes over attachment rates for VoIP service, as described in the Petition (*see* Petition at 12-14), will only worsen if the rate issues are not resolved.⁷ AT&T further agrees with the general proposition that the present disparate pole attachment rate structures applicable to providers of competing services inherently distorts the markets for those services, ultimately to the detriment of consumers.

³ Petition at 1-2, 5, 11, 14-15.

⁴ Petition at 3, 7-11, 12-16.

⁵ Petition at ii, 3-4.

⁶ Petition at 2, 5, 12, 23-24.

⁷ In this regard, AT&T also agrees with the ELCOs – Petition at 3-4 -- that it is not necessary for the Commission to determine the regulatory classification of interconnected VoIP before it addresses the appropriate rate formula for VoIP-related pole attachments.

The ELCOs' Petition, however, stops short of the logical destination of the ELCOs' arguments: parity should be established for the rates paid by *all* attachers for *all* broadband-enabled services attachments (e.g., VoIP, which requires a broadband connection) *and* broadband-capable attachments generally.⁸ Indeed, by curtailing the relief sought in the Petition to address only disparity as between cable VoIP and CLEC phone service providers, the ELCOs actually *undercut* the arguments in support of the relief sought. This is so for two reasons. First, by excluding a broad swath of VoIP and "traditional telephony" providers – ILECs – from the scope of their Petition (despite the fact that ILECs generally pay much *more* to attach to ELCOs' poles for the same attachments than either cable companies or CLECs),⁹ the ELCOs would have the Commission only address a part of the competitive problem of which the ELCOs complain, not the whole problem. Doing as the ELCOs advocate would not eliminate market distortion; rather, it would likely intensify it because it would bring CLECs into more favorable competitive position in relation to cable, but would confine ILECs to the *status quo*.

And, second, if one of the goals of the Petition is the facilitation of broadband deployment and penetration,¹⁰ then rate parity should be sought for all broadband-capable

⁸ Indeed, the Commission has already reached that very conclusion, at least tentatively, in the *2007 Pole Attachment NPRM*. See *2007 Pole Attachment NPRM*, 22 FCC Rcd at 20,210 (Commission tentatively concluded that, due to the need for even-handed treatment and incentives for broadband deployment, adoption of a uniform rate for all pole attachments capable of supporting broadband Internet access service is warranted.)

⁹ The ELCOs' Petition "focuses on attachments by cable systems." Petition at 1, n.3. Presumably this is because of the ELCOs' position that "ILEC attachments on electric poles are not subject to the Commission's pole attachment jurisdiction." *Id.* In pending proceedings before the Commission on pole attachments initiated by USTelecom, however, the ILECs have contested the ELCOs' jurisdictional views on pole attachments, and have contended that the Commission has ample statutory authority to ensure that ILECs' pole attachments are subject to just and reasonable rates, terms and conditions. See United States Telecom Association Petition for Rulemaking, RM-11293 (filed Oct. 11, 2005); *Implementation of Section 224 of the Act; Amendment of the Commission's Rules and Policies Governing Pole Attachments*, WC Docket No. 07-245, Comments of AT&T, Inc. (filed March 7, 2008).

¹⁰ See Petition at 3 ("By eliminating regulatory uncertainty regarding the applicable rate for cable attachments used to provide VoIP, the requested ruling will help ensure that poles and pole attachments continue to serve as an opportune platform for broadband deployment."); see *generally* Petition at 14-16.

attachments, including those that enable VoIP service, *regardless of the class of provider*. Competition in the broadband services market is promoted, and the Commission's broadband deployment and penetration goals advanced, by complete – not piecemeal -- elimination of market-distorting pole attachment rate disparities in the present system for broadband-capable attachments. It should not matter whether the broadband service provider is a cable company, CLEC, wireless provider or an ILEC. What should matter is that broadband providers are in active, robust competition with each other and, thus, it is crucial that the cost of inputs needed to compete – such as pole attachments -- should not be disparately set by regulation. Although the Petition may seem like a decent start in that direction, by failing to cover all broadband attachments of all providers, the Petition offers too little toward the goals it purports to advance.

B. The Commission Should Adopt the Comprehensive Attachment Rate Proposal Offered by AT&T and Verizon.

In resolving the pole attachment rate disparity issues presented in this Petition, the Commission should not limit itself to the narrow focus of the ELCOs' Petition. Rather, the Commission should take this opportunity to address the core policy issues associated with the pole attachment rate issues raised in the Petition – *e.g.*, competitive parity, elimination of market distortion caused by disparate regulatory treatment, reduction of rate disputes between attachers and pole owners, and facilitation of broadband deployment and penetration – comprehensively and efficiently. In so doing, the Commission not only would use its resources more judiciously, but it would also address more effectively the problems identified in the Petition – problems which are not confined to the narrow context presented in the Petition.

AT&T, along with Verizon, presented to the Commission a proposal last year that, if adopted, would precisely accomplish the ends the Commission should be seeking here.¹¹ The

¹¹See Letter from S. Guyer and R. Quinn to M. Dortch, October 21, 2008 (attached).

proposal sets forth a “uniform broadband rate formula that achieves the Commission’s goals of competitive parity and a single uniform rate for broadband capable attachments.”¹² All pole attachments “capable of supporting broadband Internet access service” are included within the AT&T/Verizon proposal, and not merely a subset of those attachments, *e.g.*, cable VoIP-related attachments. The proposal, if adopted, would fully address pole attachment rate disparity issues with respect to all broadband-capable pole attachments (including attachments used for VoIP, which is enabled by a broadband connection) and, thus, promote competition and eliminate the market distortion associated with the present pole attachment rate structures instead of simply refining and even intensifying that distortion. And, the proposal not only achieves a just and reasonable uniform rate for such attachments, it also ensures adequate compensation to pole owners, which addresses the ELCOs’ concern about the undue burdens borne by electric ratepayers under the current system.¹³

Adoption of the AT&T/Verizon proposal is thus a more efficient use of the Commission’s resources, because it not only will solve the problem the ELCOs have identified, but it will also address the broader set of competitive parity issues – of which the VoIP attachment rate debate is a part – that arise from a system in which providers of competing broadband (and VoIP) services pay significantly different rates for critical service inputs (*i.e.*, attaching to poles and conduits). And, establishing pole attachment rate parity for all broadband-capable attachments through adoption of the AT&T/Verizon proposal is a far more effective way to promote broadband competition, deployment and penetration than the piecemeal approach outlined in the Petition.

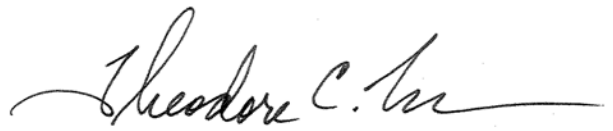
¹² *Id.* at 1-2.

¹³ *See* Petition at 5.

III. CONCLUSION

Consistent with the foregoing, AT&T urges the Commission to devote its resources to expeditiously adopting the comprehensive attachment rate parity proposal offered by AT&T and Verizon.

Respectfully submitted,

A handwritten signature in cursive script, reading "Theodore C. Marcus", written over a horizontal line.

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September 24, 2009

ATTACHMENT

October 21, 2008

EX PARTE NOTICE

Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: *Implementation of Section 224 of the Act; Amendment of the Commission's Rules and Policies Governing Pole Attachments*, WC Docket No. 07-245, RM-11293, RM-11303

Dear Ms. Dortch:

In its November 20, 2007, Notice of Proposed Rulemaking in the above-referenced docket,¹ the Commission, in accordance with the mandates of Section 706 of the 1996 Act, tentatively concluded that it should promote national broadband deployment through the adoption of a uniform rate specifically for broadband-related pole attachments.² Under existing rules, the rates that pole owners charge attachers cover all attachments, whether or not they are used for broadband, and those rates tend to be dramatically different for different broadband providers. The present structure thus distorts competition in broadband services, and it does so, moreover, by forcing some broadband providers to pay excessive pole attachment rates.³ That structure is thus contrary to the mandate of section 706, and it is imperative that the Commission address this problem. AT&T and Verizon applaud the Commission's initiative to address this problem.

In the NPRM, the Commission tentatively concluded that, due to the critical need to create even-handed treatment and incentives for broadband deployment, adoption of a uniform rate for all pole attachments capable of supporting broadband Internet access service is warranted. Thus, the Commission tentatively concluded, all categories of providers should pay the *same pole attachment rate for all attachments used for broadband service*.⁴ AT&T and Verizon set forth below a proposed uniform broadband rate formula that achieves the

¹ *Implementation of Section 224 of the Act; Amendment of the Commission's Rules and Policies Governing Pole Attachments*, WC Docket No. 07-245, RM-11293, RM-11303, Notice of Proposed Rulemaking (Rel. November 20, 2007) (NPRM).

² See NPRM at ¶ 36.

³ See, generally, Time Warner Telecom, Inc.'s White Paper on Pole Attachment Rates filed in Petition of the United States Telecom Association for Rulemaking to Amend Pole Attachment Rate Regulation and Complaint Procedures, RM-11293, and Petition for Rulemaking of Fibertech Networks, LLC, RM-11303 at pp. 3-9 (January 16, 2007).

⁴ See NPRM at ¶ 36. Thus, attachments used exclusively for non-broadband service, e.g., cable-only service, or cable + telecom-only service, would not be covered under the uniform broadband rate concept.

Commission's goals of competitive parity and a single uniform rate for broadband capable attachments. Specifically, this proposal would result in a just and reasonable uniform rate for all pole attachments capable of supporting broadband Internet access service, thereby eliminating the regulatory disparities that currently distort competition for broadband services. Moreover, it would do so in a way that would result in just and reasonable rates, as required by Section 224, and that would afford adequate compensation to pole owners. The AT&T and Verizon proposal also would provide the benefit of greater simplicity than present formulas under Section 224 and the Commission's rules.

I. The New Formula.

A. Section 1.1409(e)(2) of the Rules.

The starting point for the formula is familiar: the existing Section 224 formula for telecommunications carriers, established in Section 1.1409(e)(2) of the Commission's rules.⁵ All of the essential elements of the structure of that formula are present, though there are some adjustments to the assumptions for those values. Thus, this is a formula with which all attachers (and the Commission) already have general experience, and the adjustments – as will be detailed – will simplify the application. Three essential elements, however, are unchanged: (1) the use of net pole investment;⁶ (2) carrying charges; and (3) pole heights.⁷ These elements provide the foundation for the annual recovery by pole owners of their poles' costs.

B. Adjustments to Certain Elements.

There are certain changes to the following elements that appear in Section 1.1409(e)(2):

1. *Allocation of unusable space.* In the Section 1.1409(e)(2) formula, the attaching entities' financial responsibilities are limited to a portion of two-thirds of the unusable space. The pole owner is assigned a portion of that two-thirds, and also the costs of the remaining one-third of unusable space. Under the AT&T and Verizon proposal, the costs associated with

⁵ See 47 C.F.R. § 1.1409(e)(2). Indeed, much of the structure and assumptions of the formula is similar to Dominion Virginia Power's proposal in these proceedings. See Decl. of M. Roberts, Attached to Comments of Ameren Services Company and Virginia Electric and Power Company (Dominion Power) at ¶¶ 12-15.

⁶ Where net pole investment is zero, or negative, the formula should "us[e] gross figures rather than net figures, with the exception of the rate of return element of the carrying charges. . . ." *Amendment of Commission's Rules and Policies Governing Pole Attachments*, CS Docket No. 97-98, and *Implementation of Section 703(e) of the Telecommunications Act of 1996*, CS Docket No. 97-151, Consolidated Partial Order on Reconsideration, FCC 01-170, at ¶¶ 35, 39 (2001) (*Consolidated Partial Recon. Order*).

⁷ It is generally understood that poles average 37.5' in height. See Decl. of V. Mahanger MacPhee, Attached to Comments of AT&T, March 7, 2008. See also *Implementation of Section 703(e) of the Telecommunications Act of 1996*, and *Amendment of Commission's Rules and Policies Governing Pole Attachments*, CS Docket No. 97-151, Report and Order, FCC 98-20, at ¶ 22 (1998). The assumptions in this proposal on pole heights remain unchanged from the existing telecommunications formula.

unusable space would be divided equally among all attachers and the pole owner.

2. *The presumed number of attachers.* Under existing formulae, there are two presumptions regarding the number of attachers. For poles in urban areas, five attachers are presumed (including the pole owner). In rural areas, the presumption is three (including the pole owner).⁸ This formula, on the other hand, presumes four attachers (including the pole owner) in all areas.⁹
3. *The presumed amount of usable space by attachers.* The Section 1.1409(e)(2) formula presumes the use of one foot of space by attachers on poles. This assumption continues in this proposal, and is extended to include all attachers.¹⁰

C. The Result.

The formula that results from these changes is as follows:

$$\text{Max Rate/pole} = \frac{\text{Occupied Space} + \text{Equivalent Share of Unusable Space}}{\text{Pole Height}} \times \text{Net Pole Investment} \times \text{Carrying Charge Rate}$$

The resulting rates achieved through the use of the AT&T and Verizon formula effectuate the language and spirit of the Commission's tentative conclusions in the NPRM, as outlined above, and responsibly promote the Commission's Section 706-based objectives. Application of the formula will produce a uniform rate for broadband-capable pole attachments that is demonstrably equitable, and reasonably approximates the normative results envisioned by the Commission in

⁸ See, e.g., *Consolidated Partial Order on Reconsideration*, FCC 01-170, at ¶¶ 71-72.

⁹ The record before the Commission establishes that the 1.1409(e)(2) presumptions do not reflect present pole attachment reality. In fact, the record evidence shows that, on average, there are between 2-3 attachers per pole (not including the pole owner). See, e.g., Comments of American Electric Power Service Corporation, *et al.*, at pp. 19-28 (March 7, 2008); Comments of Alabama Power *et al.*, at pp. 20-22 (March 7, 2008); and Comments of the Edison Electric Institute and the Utilities Telecom Council at 45-47 (March 7, 2008). The present formula's presumption, thus, more accurately reflects the actual number of pole attachers than the present telecommunications Section 1.1409(e)(2) formula.

¹⁰ See, e.g., *Implementation of Section 703(e) of the Telecommunications Act of 1996, and Amendment of Commission's Rules and Policies Governing Pole Attachments*, CS Docket No. 97-151, Report and Order, FCC 98-20, at ¶ 86 (1998) (presumptive one foot of usable space for cable attachers affirmed and applied "to attachments by telecommunications carriers generally" as an "expeditious and equitable method for determining reasonable rates"). Moreover, including ILECs within the 1' standard is justifiable on two principal grounds: (1) some of the space attributed to ILECs under decades-old, legacy joint use agreements has since been used to accommodate attachments by CLECs and cable providers; and (2) modern technology, used by all broadband providers, has greater capacity than the legacy technology in use when the joint use agreements were negotiated and may require less space for attachments.

the NPRM. And, perhaps more importantly, it eliminates a source of competitive distortion in the broadband market.

II. Legal Authority.

The Commission has ample authority to adopt this proposal as a mechanism to promote broadband deployment.¹¹ First, as the Commission has observed, Section 706 directs the Commission to “promote the deployment of broadband infrastructure.”¹² It is appropriate, thus, for the Commission to “separate out those pole attachments that are used to offer broadband Internet access service” and prescribe a competitively neutral rate structure for those attachments, which is accomplished in this proposal. Second, as explained in Verizon and AT&T’s Comments,¹³ Section 224(b)(1) makes plain that “the Commission shall regulate the rates, terms, and conditions *for pole attachments* to provide that such rates, terms, and conditions are just and reasonable”¹⁴; and (2) Section 224(a)(4) expressly defines the term “pole attachment” as “*any attachment by a . . . provider of telecommunications service* to a pole, duct, conduit, or right-of-way owned or controlled by a utility.”¹⁵ There is no dispute that ILECs are providers of telecommunications services when they offer telecommunications services to the public for a fee.¹⁶ Thus, Section 224 provides the Commission the authority to adopt a new rate formula to ensure just and reasonable rates for broadband attachments by all broadband providers.

Moreover, the Supreme Court has recognized the legitimacy of such an approach and the authority of the Commission to pursue it. In *NCTA v. Gulf Power Co.*, the Court specifically acknowledged the Commission’s authority to establish pole attachment rates that it deems appropriate for the promotion of broadband deployment, including the removal of barriers to infrastructure investment. *See NCTA v. Gulf Power Co.*, 534 U.S. 327, 339 (2002). Disparate rates for broadband-capable pole attachments, which necessarily skew competition and chill

¹¹ The implementation of an order adopting this proposal, of course, would implicate existing joint use and licensing agreements. The D.C. Circuit has held that Section 224 of the Act gives the Commission the power to prospectively release parties from contractual arrangements relating to pole attachments so that the parties may conform those arrangements to Commission rules implementing Section 224. *See Monongahela Power Co. et al. v. Federal Communications Comm’n*, 655 F.2d 1254, 1256-57 (1981). Indeed, the Commission has previously exercised that authority. Accordingly, and consistent with its authority under Section 224, the Commission should require parties prospectively to conform their agreements to any new rate standards it adopts in this proceeding.

¹² NPRM at ¶ 36.

¹³ *See* Comments of Verizon at 6-10 ; Comments of AT&T at 25-33.

¹⁴ 47 U.S.C. § 224(b)(1) (emphasis added).

¹⁵ *Id.* § 224(a)(4) (emphasis added).

¹⁶ *See id.* § 153(46) (“The term ‘telecommunications service’ means the offering of telecommunications for a fee directly to the public, or to such classes of users as to be effectively available directly to the public, regardless of the facilities used.”). *See also Implementation of the Local Competition Provisions in the Telecommunications Act of 1996*, First Report and Order, 11 FCC Rcd 15499, ¶¶ 992-993 (1996) (recognizing that ILECs are providers of telecommunications service) , *modified by*, 11 FCC Rcd 13,042 (1996), *aff’d in part, vacated in part by sub nom. Competitive Telecomms. Ass’n v. FCC*, 117 F.3d 1068 (8th Cir. 1997).

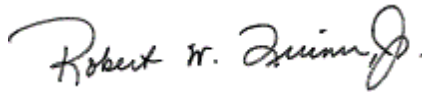
broadband investment, is exactly the kind of regulatory barrier that should be removed in order to promote the unfettered broadband investment and buildout that Congress sought through the passage of Section 706 of the Act, and that the Supreme Court has recognized as legitimate.

This proposal is fully consistent with Section 224. As the Supreme Court noted in *NCTA*, Section 224's cable and telecom attachment formulas are not the "exclusive rates" applicable to pole attachments. Rather, they "are simply subsets of – but not limitations upon" – the Commission's authority to "prescribe just and reasonable rates . . . without necessary reliance upon a specific statutory formula devised by Congress." *NCTA*, 534 U.S. at 335-36. The uniform broadband-capable pole attachment rate produced by this proposal, thus, not only satisfies the Commission's Section 706 mandate, but does so in a way that is fully consistent with the Section 224's "just and reasonable rate" requirements.¹⁷

Respectfully submitted,



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¹⁷ A harmonious construction of two statutory provisions, particularly within the same Act, is preferred of course, unless the Legislature expresses a clear intent to the contrary. *See, e.g., Implementation of the Cable Television Consumer Protection and Competition Act of 1992*, MM Docket No. 92-265, Memorandum Opinion and Order on Reconsideration and First Report and Order, 10 FCC Rcd 3105, 3125, ¶ 38 ("more compelling rule of statutory construction" requires that interpretation of language in one section of a statute be construed harmoniously with other provisions in the same statute.)

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